

**J. David Morrissy**

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**From:** J. David Morrissy  
**Sent:** Tuesday, May 07, 2019 9:41 AM  
**To:** Ning Ye  
**Subject:** RE: Supplemental RFP Response

Mr. Ye:

I do not understand much of your correspondence. However, I must address a few important points.

First, your client is still in default of the Court's order to make a substantive discovery production. Your latest production does not come close to fulfilling your client's obligations as it does not seem to address any of my client's requests – and certainly does not address a basis for any of your client's counterclaims. I have invited a discussion about this, but you have refused. You now claim you have no further documents to produce.

Notwithstanding your client's lacking discovery production, I was forced to notice your client's deposition because of the impending close of discovery (and I noticed it for a day you confirmed availability).

Also, you are incorrect about your statement that my client has not responded to your discovery requests. I served my responses by Federal Express on April 19, 2019 – which you undoubtedly received (please recall that we have discussed my client's objection to your improper interrogatories, which was included with that service). Additionally, I served a supplemental response relating to all of your client's defamatory statements upon you and your co-counsel by e-mail after we had both agreed that service by e-mail is acceptable.

As always, I am happy to discuss any of this. Should you wish to call, my direct dial telephone number is below.

-David

**J. David Morrissy, Esq.**

**ZEK**

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